

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
International Comparison and)	GN Docket No. 09-47
Survey Requirements in the)	
Broadband Data Improvement Act)	
)	
Inquiry Concerning the Deployment of Advanced)	GN Docket No. 09-137
Telecommunications Capability to All Americans)	
in a Reasonable and Timely Fashion, and Possible)	
Steps to Accelerate Such Deployment Pursuant to)	
Section 706 of the Telecommunications Act of)	
1996, as Amended by the Broadband Data)	
Improvement Act)	

**COMMENTS OF
ALPHA OMEGA BROADCASTING OF ALBUQUERQUE, INC.
IN RESPONSE TO NBP PUBLIC NOTICE #26**

Alpha Omega Broadcasting of Albuquerque, Inc. ("Alpha Omega"), by counsel, hereby submits its comments in response to the FCC's National Broadband Public Notice #26, DA 09-2518, released December 2, 2009. Alpha Omega is the licensee of full service station KAZQ(TV) and low power television station KTVS-LD, both in Albuquerque, New Mexico. The Commission requests public comment on the question of whether sufficient spectrum is presently available for the nation's long-term needs for establishing a comprehensive wireless

broadband system, and whether spectrum presently allocated to broadcast television could be reallocated for wireless broadband services.

Alpha Omega is unable to evaluate whether sufficient spectrum will be available for all of the demand that might be generated for broadband in the future. But Alpha Omega can state emphatically and with certainty that the spectrum presently allocated to broadcast television will absolutely be needed for broadcasting for the foreseeable future. After nearly two decades of preparation, digital television has finally just been implemented and the full value that it can deliver to the American public has not yet been realized. It would be tremendously inequitable to broadcasters and a great disservice to the American public to discard the promise of digital television just when it is about to become a reality.

Alpha Omega offers three separate streams of standard definition programming on KAZQ, and is about to add a fourth program stream. Plans are also nearly complete for a second standard definition digital stream on WTVS-LD. Digital multicasting technology has allowed Alpha Omega to offer the public up to six discrete program streams where there were only two in the analog world. We are now able to provide an enormously enlarged variety of content to our viewing audience – all of it absolutely free over-the-air television. New segments of the public can be served and reached with content appealing to their special needs and interests.

However, this dramatic upgrade in service did not come without cost. Alpha Omega has invested over \$1 million in new plant and equipment in order to meet the mandates of the digital television transition. Expenditures of this magnitude represent a substantial sacrifice for a small broadcaster like Alpha Omega. While the digital transition was the result of a government mandate, Alpha Omega is pleased with the capability it has engendered to increase service to the

public. Nonetheless, the expense of the digital transition will have been an enormous waste if the spectrum needed to support it taken away. Precious resources devoted to a brief flash-in-the-pan digital television service could have been better used for more durable facilities upgrades that would continue to provide benefits to the public far into the future. The stress that licensees have endured to expend resources and meet transition deadlines for the sake of going digital would devolve into tragedy if those digital facilities were precluded from developing and blooming into fully mature instruments to meet the public's needs and interests.

Alpha Omega respectfully urges the Commission not to consider reallocating spectrum away from digital broadcast television.

Respectfully submitted,

ALPHA OMEGA BROADCASTING
OF ALBUQUERQUE, INC.

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